

History of Drinking Water Contamination at Hoosick Falls in New York

Summary

Ex. 5 - Deliberative Process

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History

- Saint-Gobain Performance Plastics Corporation (SGPP) and prior owners of the plant, including DuPont, used PFOA to manufacture products there, including heat-resistant wiring, dating back decades. SGPP purchased the plant in 1999 becoming the fifth owner of the facility since it opened in 1956. The France-based company also owns another manufacturing plant. SGPP processes fluoropolymers at the Hoosick Falls Facility that were made with PFOA. Since 2003, SGPP has participated in the industry's voluntary PFOA phase-out effort by purchasing raw materials with decreasing levels of PFOA as an ingredient.
- EPA is investigating other sources of PFOA in Hoosick Falls.
- Four samples collected from the public water supply in Hoosick Falls on June 4, 2015, which serves about 4,900 people, were found to contain more than 600 ppt (ng/L) PFOA, exceeding EPA's "provisional health advisory" of 400 parts per trillion (0.4 ppb). Additionally, 2015 groundwater sampling at the SGPP facility on McCaffrey Street in Hoosick Falls found levels as high as 18,000 ppt. Certain private wells in the area have also shown the presence of PFOA, though not at levels above 400 ppt, as far as EPA is aware.
- Soil sample results for PFOA were obtained in conjunction with development of the wells. The soils showed very low levels of PFOA.
- The EPA is recommending people not drink or cook with water from the municipal water supply due to the presence of PFOA.
- SGPP is paying for bottled water for residents. The company has said it would pay for upgrades to the water treatment plant that would almost eliminate any PFOA, a project estimated at \$2.2 million.
- TSCA 8(e) notice was submitted to EPA by Saint-Gobain on December 30, 2014 after SGPP was made aware of PFOA measurements conducted by the Village of Hoosick Falls in three wells used to supply drinking water to the community.
- A follow-up 8(e) submission was sent on November 17, 2015 on additional analysis by SGPP undertook a Phase I Investigation at SGPP's Hoosick Falls Facility to determine whether PFOA was present in soil or groundwater underneath the Facility.

- OW update: The perfluorooctane sulfonate (PFOS) Health Effects Document (HED) that contain the reference dose (RfD) needed to calculate the lifetime health advisory value is with the EPA internal reviewers. PFOA HED is planned to be completed this week and then sent to internal reviewers.
- Region sent letter to Village Mayor on 11/25/15:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 25 2015

Honorable Mayor David B. Borge
Municipal Building
24 Main Street
Hoosick Falls, NY 12090

Dear Mayor Borge:

I am writing regarding the perfluorooctanoic acid (PFOA) water contamination that has been discovered in groundwater and drinking water in the Village of Hoosick Falls, NY. On October 15, 2015, I was contacted about the problem with the Hoosick Falls public water supply and was asked if funding from the U.S. Environmental Protection Agency (EPA) was available to address this drinking water problem.

EPA does not have a funding stream to which the Village could apply in this situation. A more detailed response will be provided shortly. In summary, EPA provides Safe Drinking Water Act State Revolving Funds to New York State to address drinking water needs. EPA's Safe Drinking Water Act State Revolving Fund Program is implemented by the New York State Department of Health (DOH).

Because of PFOA's extreme persistence in the environment and its toxicity, mobility and bioaccumulation potential, which pose potential adverse effects to human health and the environment, EPA has been gathering information regarding the Hoosick Falls PFOA contamination and has been discussing this matter with DOH and the New York State Department of Environmental Conservation (DEC). While EPA has not, to date, promulgated an enforceable drinking water standard for PFOA under the Safe Drinking Water Act, in 2009, EPA's Office of Water established a provisional health advisory of 400 nanograms per liter, that is, 400 parts per trillion (ppt), for PFOA.¹

Provisional health advisories reflect reasonable, health-based hazard concentrations above which action should be taken to reduce exposure to unregulated contaminants in drinking water. In 2014, EPA stated that its provisional health advisory for PFOA, if exceeded, suggests the need for discontinuing use of the water for drinking or cooking; and that the advisory reflects an amount of PFOA that may cause adverse health effects in the short term (weeks to months).

¹ See http://water.epa.gov/action/advisories/drinking/upload/2009_01_15_criteria_drinking_pfa-PFOA_PFOS.pdf.

² An additional EPA fact sheet about PFOA can be found at http://www2.epa.gov/sites/production/files/2014-04/documents/factsheet_contaminant_pfos_pfoa_march2014.pdf and is enclosed. Please note that EPA is currently reviewing the state of the science on PFOA and other perfluorinated compounds, which may lead to further advisories, including an advisory addressing long-term health effects.

As you know, four samples collected from the public water supply in Hoosick Falls on June 4, 2015 were found to contain more than 600 ppt of PFOA. Additionally, 2015 groundwater sampling at the Saint-Gobain Performance Plastics facility on McCaffrey Street in Hoosick Falls found levels as high as 18,000 ppt. Certain private wells in the area have also shown the presence of PFOA, though not at levels above 400 ppt, as far as EPA is aware.

Based on the presence of PFOA above 400 ppt in Hoosick Falls public drinking water supply wells, it is recommended that an alternate drinking water source (e.g., bottled water) be provided to the users of the Hoosick Falls public water supply, until such time as PFOA concentrations in drinking water are brought consistently below the 400 ppt level. EPA also recommends that during this period, drinking water from the public water supply not be used for cooking (e.g., boiling pasta, making soup, steaming vegetables, etc.). Boiling the water does not diminish the potential health risk associated with the PFOA.

EPA recommends that the Village of Hoosick Falls' web site be updated to conform with the information provided above, and that any information provided to the residents by the Village relating to the water contamination issue be consistent with this information as well. While the Village's web site does mention an EPA "guideline" of 400 ppt for PFOA, we recommend that the information that I have provided above regarding EPA's 400 ppt provisional health advisory, and the significance of that advisory, along with the above Internet links, be included in the web site's discussion of the water contamination issue.

In addition, EPA recommends the following corrections to the Village's web site:

- The web site incorrectly cites a 200 ppt guideline for PFOA. The 200 ppt provisional health advisory that EPA issued is for a different compound ("PFOS"), not PFOA.
- The web site contains the statement, "The EPA is in the data collection phase only." We recommend that sentence be deleted. While EPA is gathering data about PFOA in public water systems, EPA has also issued a provisional health advisory, as discussed above.
- The following sentences on the Village web site should be deleted: "Village residents should be aware that the numbers in each sample represent parts per trillion and the EPA guidelines are based on parts per billion. As yet, there is no standard or benchmark to determine how these numbers are to be interpreted for their impact on public health." As discussed above, EPA's provisional health advisory for PFOA is 400 parts per trillion.

² See <http://water.epa.gov/drink/standards/upload/Peer-Review-of-Health-Effects-Documents-for-PFOA-and-PFOS-Factsheet-February-2014.pdf>.

In addition to ensuring the accuracy of the information provided to the public, appropriate measures in groundwater and drinking water contamination situations such as this one may include, among other things, some or all of the following actions, whether such measures are taken by the Village, by an entity that is the source of the contamination, or by some other party:

Public and private drinking water supplies

- As a temporary measure until a more permanent, safe drinking water supply is provided, provision of bottled water to residents in the impacted and potentially impacted area;
- Encourage the private well owners to identify themselves and sign up for well sampling to determine whether contamination is present;
- After obtaining approval from the Department of Health, installation, operation and maintenance of a treatment system on the public water supply that will effectively treat PFOA (granular activated carbon filtration is one such system);
- Appropriate training for the public water system operators to ensure that the system is working at optimum capacity and effectively and efficiently removing the contaminant in the water source;
- Ensuring the financial capability to support the cost of the granular activated carbon system maintenance requirements going forward;
- A contingency plan to ensure that safe drinking water will continue to be provided to the public even if and when the primary treatment system is taken offline;
- If a private well is confirmed to have PFOA contamination at a level of 400 ppt or above, then bottled water should be provided to that residence, followed by a more permanent solution – *i.e.*, either an individual treatment system (such as a Point of Entry Treatment Systems) or connection to the public water supply;
- Regular monitoring of both the treated and untreated water at the public water supply;

- Regular monitoring of the impacted private wells, and based on a groundwater plume delineation or other appropriate information, sampling of certain additional private wells. (To date, DOH has done some essential, limited sampling of private drinking water wells in the area to determine whether the wells are impacted by PFOA at levels of concern. There needs to be a commitment to do substantially more private well sampling.)

In addition, EPA will work with DEC and DOH with respect to the need for the following efforts, which would be directly overseen by EPA or the State of New York, based on future discussions with the State:

- Investigation of the nature and extent of contamination and identification of the source(s) of the contamination
 - Such an investigation may include a hydrogeological study (including installation and sampling of groundwater monitoring wells), soil, sediment and surface water sampling, review of historical records and databases, and other investigations and analyses; and
 - Modeling of air deposition from PFOA air emissions.
- Identification and implementation of one or more early interim measures
 - Such interim measures may involve addressing the potential source(s) and/or containing the groundwater contaminant plume.
- Feasibility Study and Remedial Action
 - Identification and analysis of potential alternatives to remediate the groundwater contamination, the source(s) of the contamination, and any other contaminated areas; and
 - Selection and implementation of a remedial alternative(s).
- Sampling in Hoosick River, including fish

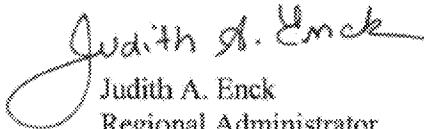
I understand that Saint-Gobain Performance Plastics has agreed to pay for the provision of bottled water to residents and the installation of a carbon filtration system on the public drinking water supply. As indicated above, there are additional important measures that need to be addressed.

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If you have any questions or would like additional information about any of the matters discussed above, please contact me at 212-637-5000 or Pat Evangelista at 212-637-4447 or evangelista.pat@epa.gov.

Thank you.

Sincerely yours,


Judith A. Enck
Regional Administrator

Enclosure

cc: Nathan Graber, NYSDOH
Basil Seggos, NYSDEC
Honorable Kathy Jimino, Rensselaer County Executive

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- On 1/5/16 EPA sent the following list of suggested actions to St Gobain's Lawyers and the New York State Department of Health to guide negotiations:[EMBED AcroExch.Document.11]